

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

CA #: 04CV12058WGY

BETTE J. RIVARD, as Administratrix of)
the Estate of John A Horton,)
Plaintiff)
v.)
DARTMOUTH HOUSE OF CORRECTION,)
BRISTOL COUNTY, JOHN DOE,)
RICHARD ROE, Bristol County Corrections)
employees the identity and number of whom is)
presently unknown to the Plaintiff,)
Defendants/)
Third Party Plaintiffs)
v.)
PRISON HEALTH SERVICES, INC. and)
CORRECTIONAL HEALTH CARE)
SOLUTIONS, INC.)
Third Party Defendants)
)

**CERTIFICATE PURSUANT TO L.R. 7.1 FOR PRISON HEALTH
SERVICES, INC'S MOTION TO TAKE THE DEPOSITION OF MARK HIGGINS A
PERSON CONFINED IN A COUNTY CORRECTIONAL FACILITY**

I, Mary Eiro-Bartevyan, counsel for Prison Health Services, Inc., hereby certify that I have conferred with Plaintiff's counsel and co-defense counsel in the above captioned matter and attempted in good faith to resolve or narrow the issues contained within this motion. I also certify that neither party has any objection to this motion to depose Mark Higgins.

Respectfully submitted,
Prison Health Services, Inc.
By its attorneys,

DATED:8/24/05

/s/ Mary Eiro-Bartevyan
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CERTIFICATE OF SERVICE

I, Mary Eiro-Bartevyan, attorney for Prison Health Services, Inc., hereby certify that I have this 24th day of August, 2005 forwarded a copy of the foregoing document, by first-class mail, postage pre-paid, upon counsel of record named below:

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/s/ Mary Eiro-Bartevyan _____

Mary Eiro-Bartevyan